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WELDON SPRING SITE REMEDIAL ACTION PROJECT
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St. Charles, MO 63303

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SUBJECT STORAGE OF PCB WASTE AT WSS BEYOND ALLOWABLE TIME LIMITS - 4 OCFR61.65(a) (CC: DOE LETTER TO EPA)

AUTHOR MCCRACKEN, STEVE H. TO MORBY, ROBERT L. DATE 12/06/89

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THIS IS A RESPONSE TO COMMUNICATION: NUMBER DATED

ACTION ITEM TRACKING

INITIATE ACTION ITEM

INDIVIDUAL ASSIGNED TO ACTION DEPARTMENT

ACTION REQUIRED

DUE DATE / / ACTION ITEM LOG NUMBER

IF ADDITIONAL ACTION ITEMS ARE ATTACHED, HOW MANY?

CLOSE ACTION ITEM

IS THIS A RESPONSE TO AN ACTION ITEM? NO ✓ YES

ACTION ITEM LOG NUMBER CLOSING DOCUMENT DIN

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Weldon Spring Site
Remedial Action Project Office
Route 2, Highway 94 South
St. Charles, Missouri 63303

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December 6, 1989

M-K FERGUSON CO.
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DEC 06 1989
WSSRAP CONTRACT 3589

Mr. Robert Morby
Superfund Branch
U.S. Environmental Protection Agency
Region VII
726 Minnesota Avenue
Kansas City, Kansas 66101

Dear Mr. Morby:

STORAGE OF PCB WASTE AT THE WELDON SPRING SITE BEYOND ALLOWABLE TIME LIMITS - 40 CFR 761.65(a)

During the course of our site characterization and response activities, we are identifying some waste materials which are subject to the provisions of RCRA and TSCA. As these materials are identified, actions are being taken to assure proper and safe storage. For non-radiologically contaminated RCRA or TSCA material we have and will continue to pursue offsite disposal alternatives. For materials that are radiologically contaminated and are subject to holding time limitations we are also pursuing offsite disposal alternatives, however, none are currently available. We expect additional quantities of similar types of waste to be identified as our efforts to complete the site characterization and response actions continue.

As of November, 1989, the site inventory of confirmed or suspected radiologically contaminated RCRA or TSCA material includes approximately:

- 7,400 gallons of Tributyl Phosphate (TBP) (PCB and mercury contaminated).
- Fourteen 55-gallon drums containing miscellaneous debris such as soil and protective clothing, all of which are PCB contaminated.
- One 5-gallon drum of mercury contaminated soil & debris.
- Five pounds of elemental mercury.
- One-hundred ten 55-gallon drums of characteristically hazardous waste.

- Thirty-four capacitors containing PCB oils.
- Three 55-gallon drums of listed hazardous waste.

The inventory of PCB contaminated material has been in storage in excess of one year and we are concerned that the storage time limit imposed by 40 CFR 761.65(a) has been exceeded. In the case of the TBP, which was generated during a plant retrofit (ca. 1968), storage has exceeded 20 years.

On a national basis, the DOE is currently preparing a report that will identify available treatment capacity for mixed waste. Subject to the findings of this report we do not know of any currently available treatment and disposal options for radiologically contaminated RCRA or TSCA wastes. We have initiated the necessary actions to facilitate treatment of the PCB contaminated material at an incinerator in Oak Ridge, Tennessee, which is expected to be operational next year. The earliest possible time frame for transporting to Oak Ridge is six to twelve months. As you might expect, there is a considerable backlog of material waiting to be incinerated and we will have to fit into an overall schedule for treatment.

Recognizing that we do have an overall plan to select and carry out a remedy for this site under CERCLA, we believe that an exemption to the (1) year storage limitations under 40 CFR 761.65(a) would be appropriate. Your assistance in coordinating this issue with the appropriate organizations within EPA would be appreciated. If such an exemption cannot be granted, then this will serve as notification of the situation that exists. We will continue to keep your staff advised of these and other issues at the site.

If you have any questions please give me a call.

Sincerely,

S H McCracken

Stephen H. McCracken
Acting Project Manager
Weldon Spring Site
Remedial Action Project

cc: Bill Adams, DP-85
Jim Fiore, EM-423
R. E. Hlavacek, PMC